

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SONY BMG CD  
TECHNOLOGIES LITIGATION

Case No. 1:05-cv-09575-NRB

**CLASS COUNSEL'S NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES AND INCENTIVE AWARDS  
TO NAMED PLAINTIFFS**

**GIRARD GIBBS**

**& De BARTOLOMEO LLP**

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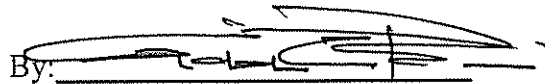
*Class Counsel*

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the Joint Affidavit of Daniel C. Girard and Scott A. Kamber, and the Declarations of Peter Safirstein, Ira M. Press, Oren Giskan, Cornelius P. Dukelow, Barry M. Altman, Dennis A. Burke, Tracy D. Rezvani, Michael D. Halbfish, Alan Himmelfarb, Michael L. Kelly, Robert I. Lax, Douglas A. Linde, Daniel Lynch, Paul R. Huff, William A. Baird, Ethan Preston, Stephen Raff, Brian J. Robbins, Philip A. Tortoreti, Robert I. Harwood, Jennifer Sarnelli and Joseph E. Levi, Class Counsel will move this Court on May 22, 2006 at 9:15 a.m., or as soon thereafter as counsel may be heard, at the United States Courthouse, 500 Pearl Street, Room 2270, for an order awarding attorneys' fees, reimbursement of expenses, and incentive awards to named plaintiffs.

DATED: April 6, 2006

Respectfully submitted,

**GIRARD GIBBS & De BARTOLOMEIO LLP**

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